Case 1:20-cv-06293-GBD Document 10 Filed 08 McKool S One Manhattan West 50th Floor New York, NY 10001

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August 12, 2020

VIA ECF

The Honorable George B. Daniels United Stated District Judge Southern District of New York 500 Pearl Street New York, NY 10009

SO ORDERED:

LAUG 1 2 2020

RE:

Virtu Financial, Inc. v. AXIS Insurance Co.

No.: 1:20-cv-06293, Application for Order Allowing Redactions

Dear Judge Daniels:

We represent Plaintiffs Virtu Financial, Inc. and Virtu Americas, LLC. (collectively "Virtu") in the above-referenced case. I write pursuant to Your Honor's Individuals Rules of Practice respectfully to request an order allowing Virtu to redact certain sensitive information from Exhibits B, D, and E to Virtu's Complaint.

Virtu's lawsuit is a claim for insurance coverage arising out of a hacking incident of Virtu's computer systems. Specifically, after a successful hacking campaign, the hackers took over the email account of a Virtu executive and, pretending to be the executive, directed Virtu's accounting department to transfer approximately \$10.8 million to two overseas accounts. Neither the Virtu executive nor Virtu's accounting personnel bear any responsibility for this fraud, and their identities have no bearing on the merits of the dispute pending before the Court.

As such, in the interest of preventing personal embarrassment to these individuals—who themselves are the victims of a crime—Virtu respectfully requests that the Court grant Virtu leave to redact these individuals' names from Exhibits B, D, and E to Virtu's Complaint.

Respectfully,

Robin L. Cohen

and held

¹ Due to an error, Exhibits B, D, and E were initially filed on the Court's public docket. Upon Virtu's request, the Clerk of the Court temporarily sealed these exhibits pending the Court's consideration of this application.